
From: Miguel Ángel Serrano-Urdaz
Sent: Wednesday, July 25, 2018 4:51 PM
To: hermann.bauer@oneillborges.com; ubaldo.fernandez@oneillborges.com; dperez@omm.com; andres@awllaw.com
Cc: Claudia Juan Garcia
Subject: Lift of Stay Notice - 17-3283 In re Financial Oversight Board as rep. of Commonwealth of Puerto Rico

Dear Counsel:

Pursuant to Part III Q of the case management procedures for the case of caption, I advise, on behalf of my clients, of their intent to seek relief from the automatic stay in order to continue prosecution of the cases listed below.

The clients and their cases are:

1. Juan A. Santiago Meléndez

Administrative Case 2008-07-0094 before the Public Service Appeals Commission – Request for the Commission to determine Mr. Santiago's current applicable salary according to his job position's pay level. This case is intrinsically related to Civil Case KAC2016-0328, for which Mr. Santiago and Debtors signed a stipulation to modify the stay. The Commission's decision needs to be reviewed by the Superior Court in order to determine the amounts owed to Mr. Santiago. These have been estimated at around \$30,000. The case was stayed prior to final hearing.

2. Julio Rancel López

Civil Case GDP2013-0152 – Mandamus; injunction; torts claim. Mr. Rancel is requesting an order from the Puerto Rico Superior Court for PRASA to provide health coverage for Mrs. Rancel and his daughter. Mr. Rancel's late wife was a PRASA employee and after her death, per the applicable collective bargaining agreement, Mr. Rancel and his daughter were eligible as beneficiaries of her health plan. Damages and loss of health coverage are estimated at \$100,000. The case was stayed in the midst of litigation.

3. José Miguel Malvet Santiago

Administrative Case 2007-07-0025 before the Public Service Appeals Commission – Claim for wrongful termination of employment and subsequent loss of wages. The value of Mr. Malvet's claim is estimated at \$132,000. The case was stayed in the midst of litigation.

4. Edwin F. Bones Díaz

Civil Case GDP2017-0103 – Violation of civil rights; torts; hostile work environment – Claim for discrimination in the work place which eventually led to emotional distress and other damages. Debtor's claim is in the amount of \$500,000. Defendant was served and the case was stayed shortly thereafter.

5. Rafael Bonilla Rivera

Administrative Case 2007-02-0829 before the Public Service Appeals Commission – Claim for wrongful termination and request for reinstatement to employment. Loss of wages is estimated at \$100,000. The case was stayed prior to final hearing.

6. Hiram Velázquez Rivera

Administrative Case 2015-0334 before the Retirement Systems Board (*Junta de Sistemas de Retiro*) – Claim of eligibility to disability benefits. The case was stayed in the midst of litigation. Debtor's claim is estimated at \$75,000.

7. Lisbet Torres Gutiérrez

Administrative Case 2005-07-0107 before the Public Service Appeals Commission – Request for review and order to the Salinas municipality to follow correct procedures in evaluating the promotion of Ms. Torres to a higher rank. Final hearing was pending when the case was stayed. No amounts are sought in this case.

We are open to coming to a stay modification agreement that will minimize expenses to your clients and ours.

Kind regards

Miguel Ángel Serrano Urdaz, Esq.

Malo periculosam libertatem quam quietum servitium

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